

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA  
Civil Action No. 1:19-cv-00272

---

MAXWELL KADEL, *et al.*,

Plaintiffs,

v.

DALE FOLWELL, in his official  
capacity as State Treasurer of North  
Carolina, *et al.*,

Defendants.

---

**NOTICE OF INTENT TO FILE DISPOSITIVE MOTIONS**

Pursuant to LR 56.1 (a), Counsel for Defendants Dale Folwell, Dee Jones, and the North Carolina State Health Plan for Teachers and State Employees, hereby give notice of their intention to file dispositive motions in this case.

This is the 13th day of October, 2021.

Respectfully submitted,

/s/ John G. Knepper

John G. Knepper  
Wyo. Bar No. 7-4608  
LAW OFFICE OF JOHN G. KNEPPER, LLC  
Post Office Box 1512  
Cheyenne, WY 82003-1512  
Telephone: (307) 632-2842  
Facsimile: (307) 432-0310  
[John@KnepperLLC.com](mailto:John@KnepperLLC.com)

/s/ Kevin G. Williams

Kevin G. Williams  
N.C. Bar No. 25760  
Mark A. Jones  
N.C. Bar No. 36215  
BELL, DAVIS & PITT, P.A.  
100 North Cherry Street, Suite 600  
Winston-Salem, NC 27101  
Telephone: (336) 722-3700  
Facsimile: (336) 722-8153  
[kwilliams@belldavispitt.com](mailto:kwilliams@belldavispitt.com)

### **CERTIFICATE OF SERVICE**

This is to certify that the foregoing document was filed electronically with the Clerk of Court using the CM/ECF system which will send notification of such filing to all registered users.

This the 13th day of October, 2021.

/s/ Kevin G. Williams

Kevin G. Williams

BELL, DAVIS & PITT, P.A  
100 North Cherry St., Suite 600  
Winston-Salem, NC 27101  
Telephone: (336) 722-3700  
Facsimile: (336) 722-8153  
[kwilliams@belldavispitt.com](mailto:kwilliams@belldavispitt.com)